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July 31, 2020

The Hon. Sarah Netburn  
United States Magistrate Judge  
U.S. District Court – Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

By ECF

Re: *Gao v. Graceful Services, Inc. et al.*, 18-CV-4005 (SDNY)

Dear Judge Netburn:

My office, along with TakeRoot Justice, represents the Plaintiff in the above-referenced case. Plaintiff submits this letter as a status update as directed by the Court's June 30, 2020 Order.

While the Court's order directed the parties to submit a joint status update, shortly before 5:00 pm today Plaintiff received Defendant's proposed addition to this letter, including his absolutely outrageous and false statement that I instructed my client to lie during her deposition testimony. We will address his many spurious accusations separately, but in order to timely supply this status report to the Court we submit this letter on behalf of Plaintiff alone.

Yesterday, July 30<sup>th</sup>, Defendant Graceful II Service Inc. deposed our client Ms. Gao. Pursuant to the Court's June 30<sup>th</sup> Order, discovery was extended solely for that deposition, so discovery has now been completed. Plaintiff made a settlement demand to Defendant in advance of Plaintiff's deposition but did not receive any response to the demand.

Plaintiff requested a jury trial in this case, but would also be amenable to a bench trial under the circumstances.

Respectfully,

A handwritten signature in black ink, appearing to read "Patricia Kakalec".

Patricia Kakalec  
Counsel for Plaintiff

cc: all counsel by ECF

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